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OPERATIONS, INC.

9
10 UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF NEVADA

12 ALEXIS SANCHEZ,

13 Plaintiff,

14 vs.

15 HOSPITAL CORPORATION OF
AMERICA – FAR WEST DIVISION (HCA
16 HEALTHCARE), a corporation; KIRK
JOHNSON, an individual; MONICA
17 STRAUSS, an individual; CHRISTINE
PROUTY, an individual; and DOES 1
through 10, inclusive,

18 Defendants.
19

CASE NO.: 2:25-cv-00618-ART-NJK

20
21 **STIPULATION TO CONTINUE**
DEFENDANT’S TIME TO RESPOND TO
PLAINTIFF’S COMPLAINT

(First Request)

22 Pursuant to Local Rules IA 6-1 and IA 6-2, Defendant IT&S Far West Division – HCA IT&S
23 Field Operations, Inc.¹ (“Defendant”) and Plaintiff Alexis Sanchez (“Plaintiff”) hereby requests a
24 short extension of time, up to and including April 21, 2025, for Defendant to file its response to
Plaintiff’s Complaint (ECF No. 1-1).

25 The Stipulation is entered for the following reasons:
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27 ¹ Defendant IT&S Far West Division – HCA IT&S Field Operations, Inc. was incorrectly identified
28 in the Complaint as “Hospital Corporation of America – Far West Division.”

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1 Defendant filed its Petition for Removal on April 4, 2024. (ECF. No. 1.) Pursuant to
2 Federal Rule of Civil Procedure 81(c)(2)(C), the deadline for Defendant to files its response is April
3 11, 2025.

4 2. Defendant respectfully requests this extension in order to have the time to fully
5 research the facts and circumstances underlying this case, and not for purposes of delay.

6 3. This is the parties' first request for an extension of time for Defendant to file its
7 response.

8 Therefore, the parties respectfully request a ten-day extension of time up to and including
9 April 21, 2025 for Defendant to file its response to Plaintiff's Complaint.

10 DATED this 11th day of April, 2025.

DATED this 11th day of April, 2025.

11 SABEL LAW APC

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

12 /s/ Steven D. Sabel

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17 *Attorneys for Plaintiff,*
18 *Alexis Sanchez*

Attorneys for Defendant,
IT&S Far West Division – HCA IT&S Field
Operations, Inc.

ORDER

21 IT IS SO ORDERED.

22 
23 United States Magistrate Judge

24 April 14, 2025

25 DATED
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27
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